



PPR's response to DFC Proposals for the Review of the Decent Homes Standard Consultation, 4 March 2026

Overview

The legally binding element of the DFC's 2004 Decent Homes Standard – applicable equally to the Housing Executive's roughly 83,000 (and housing associations' nearly 60,000) social homes – is the 'minimum fitness standard' common to all residential properties in the north (under section 46 of the [Housing \(NI\) Order 1981](#), explicitly extended to private tenancies by the [Private Tenancies \(NI\) Order 2006](#))).

In addition to this legal minimum standard, the 2004 Decent Homes Standard also has requirements around 'a reasonable state of repair', 'reasonably modern facilities and services' and 'a reasonable degree of thermal comfort'. **It lacks, however, accessible and transparent mechanisms that tenants can use to hold their landlords to account and ensure the standard is enforced in practice.** (Responsibility for inspections of private rented properties fall to councils, and those of social homes, to the Housing Executive itself).

The Decent Homes Standard has remained unamended since 2004, though a 2016 [consultation](#) presented "options for change" that were apparently not pursued. (The 2016 consultation document is no longer publicly available; PPR requested a copy by Freedom of Information in autumn 2025 but the DFC refused, claiming a 'policy development' exemption on the basis of this current consultation.)

In the 2025/26 version of this consultation, at any rate, the DFC seems to present little in the way of "options for change". Real opportunities for substantive change provided by the example of **Housing Health and Safety Rating System**, brought in to monitor compliance with the Decent Homes Standard in England and Wales, and the 2025 passage of **Awaab's Law** around mould, damp and other health threats in housing, have been passed over in favour of the status quo.

The purpose of the consultation exercise appears to have been, at least in part, simply to **update** the Decent Homes Standard's 20-year-old wording to match subsequent building regulations and Housing Association Guide content.

New text (on lifts, communal areas and fire risk assessment, for instance) is specific to **flats** -- highly relevant given the recently announced decision-- grounded in regulations in England and Wales that as yet have not been brought in here-- to [evacuate](#) the Housing Executive's Carnet House tower block due to fire safety concerns. But regulation-based additions hardly need consultation.

In addition, the DFC have chosen to add a host of **aspirational elements** (from smart meters and electric vehicle charging points to more basic components like recycling, storage and drying space), framed as 'desirables' only. Its consultation asks whether these have approval – but given that they are not binding, this seems a moot point.

Equally telling are the elements that remain **unchanged**. 'Reasonably modern facilities and services' still means, at a minimum, a 20-year-old kitchen and a 30-year-old bathroom. A home in which both are older than that would, as before, still meet Decent Homes Standard unless it failed in a third area.

The DFC seem to have updated the Decent Homes Standard, not in the interest of concrete improvements to make it more useful and impactful, but mainly to be seen to have done so.

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The DFC's 'consultation [report](#)' is largely an overview of substantive developments elsewhere in the UK, with however no corresponding proposals for NI. It is accompanied by a [summary](#) table on the 2004 NI standard alongside a [second table](#) of purported DFC proposals for improvements.

Upon scrutiny, much of the proposed 'new' text for the Decent Homes Standard reflects **already-embedded procedural changes**: to Building Control regulations on carbon monoxide and waste, for instance, or to longstanding Housing Association Guide content around [classification of and response times for repairs and maintenance](#) or [damp and mould](#). These 'changes' are not policy changes – they are edits that bring the text of the Decent Homes Standard up to speed with approved policy and procedures after a 20-year stint on the shelf.

Much of the proposal's genuinely 'new' content is presented in the form of **'desirable' but wholly non-binding aspirations**: elements which according to the DFC "may not be financially or technically feasible for existing dwellings" and which "will not be formally measured".

This is an enormously significant **missed opportunity** to make the Decent Homes Standard more meaningful and more robust. In particular, the proposed changes fail to respond to the detailed requirements on **availability of services** and **habitability** set out under the [right to housing in the International Covenant on Economic, Social and Cultural Rights](#), which are intended to provide guidance to countries who have signed and ratified the treaty, such as the UK.

As the quotes below (from participants in housing clinics supported by PPR) demonstrate, the Decent Homes Standard is already regularly breached with absolute impunity, causing real damage to individuals and families. Instead of trying to rectify this – to strengthen the standard and give it teeth – the current DFC proposals appear to retreat in the opposite direction. If anything, by adding a swathe of new elements that are by definition purely aspirational, the DFC proposals risk actually **undermining further** the largely moribund Decent Homes Standard.

Mould and damp

“Internally the house has bad mould and damp which is having a significant impact on all those who are in the property. As you will be well aware, mould and damp can cause serious respiratory issues and worsen existing ones. It is incredibly dangerous for children to live in mould and damp conditions. I have recently been in hospital due to the effects the mould and damp is having on my respiratory system.” (Social housing tenant and housing clinic participant in a letter to the NIHE, Sept 2025)

The 1981 legally-mandated minimum fitness standard that all NI homes be “free from dampness prejudicial to the health of occupants” has been part of the Decent Homes Standard since its inception in 2004; it just hasn’t been enforced. The DFC proposals do not address the enforcement gap; instead they merely bring the Decent Homes Standard in line with already existing, non-statutory Housing Association Guide [content](#) on damp and mould from 2023.

Nor does the DFC appear to be actually consulting on raising the bar regarding tenants’ legal protections from the impact of exposure to damp and mould in the wake of the October 2025 [Awaab’s Law](#) in England and Wales. The law is named for a two-year-old who died after prolonged exposure to mould and damp in his home, and it mandates strict legal timeframes for social and ([eventually](#)) private landlords in England and Wales to respond to damp and mould. It provides avenues for real change: social tenants in England and Wales can use Awaab’s Law to hold their landlords to account, taking them to court if they fail to investigate and fix dangerous damp and mould within the established time frames. Further, in 2026, requirements will expand to apply as well to excess cold and excess heat; falls; structural collapse; fire, electrical and explosions; and hygiene hazards; and in 2027 to the remaining hazards as defined by the **Housing Health and Safety Rating System**, used in England and Wales to monitor compliance of the Decent Homes Standard.

Awaab’s Law could be replicated here; so too could the Housing Health and Safety Rating System. **The DFC doesn’t propose either.** Its table of proposed changes doesn’t mention Awaab’s law at all, and its consultation response form says only that it has “considered” the response timeframes requirement within Awaab’s Law during its deliberations. Concretely, the content it chose to put into its table of proposals is another pro forma ‘update’ of the

Decent Homes Standard to match existing practice (this time, the longstanding response timeframes lifted from the Housing Association Guide).

Similarly, the DFC's consultation response form says it has "worked closely with the sector to identify risks [around mould and damp, in the wake of Awaab's Law] and support them to address these. We consider that a proportionate and appropriate response here may be to incorporate similar, robust standards around investigation and resolving hazards **within existing Social Housing frameworks** [emphasis added]". In other words, rather than emulating the defining characteristic of Awaab's Law-- strengthening tenants' ability to hold landlords accountable in court – the DFC reiterates its preference for 'existing frameworks' rather than change – this despite widespread [media](#) and [political party scrutiny](#) of the impact of damp and mould in people's homes here, and the failures of landlords to respond.

Space / overcrowding

"We have been living in extremely overcrowded conditions with a severe damp and mould problem for over a decade now. Myself and one of my sons have asthma exacerbated by the cramped conditions that are a breeding ground for the damp and mould.... all of these issues - the overcrowded conditions, the impact of the damp and mould on my children's health ... are having a major impact on our family relationships/dynamics. I am at breaking point with it all and just want a safe, secure and habitable home to raise my family in." (Social housing tenant and housing clinic participant in a letter to the NIHE, May 2025)

"My son is diagnosed with asthma and severe allergies for which he has been awarded Disability Living Allowance and is in dire need of his own room. He currently shares a room with myself and his sister which is cramped and uncomfortable. Added to this, [he] has a continuous cough which keeps both him and us awake at night, resulting in none of us getting a full night's sleep. This then impacts the children's moods, wider family dynamics and their academic performances in school." (Social housing tenant and housing clinic participant in a letter to the NIHE, Jan 2025)

In the face of multiple similar accounts of the human suffering caused by cramped quarters and overcrowding, the DFC's 'update' to the Decent Homes Standard makes 'space' another 'desirable but non binding' aspiration – which is to say, another missed opportunity.

Digital connectivity

"Without internet I can't update my Universal Credit, I can't engage in services, can't apply for jobs, and any tech course I look at for next year they are saying they are all online. I am being held back because of where I live which is out of my control." (young person living in a hostel, from PPR's [Locked Down and Cut Off](#) report)

Internet access is recognised as a human right and, as the Covid pandemic clearly demonstrated, one upon which many other human rights are increasingly dependent. Despite this, five years on digital connectivity – what the DFC describes as ‘infrastructure for at least one form of permanent broadband connection’-- is considered as an aspiration-- ‘desirable’ rather than mandatory.

Temporary accommodation

Dozens of participants in housing clinics have written letters documenting the impact of being placed by the Housing Executive in far-flung emergency accommodation in hotels, without access to kitchen or laundry facilities that would be required under the Decent Homes Standard. MLAs have also clearly been contacted by many families in similar circumstances, giving rise to a plethora of NI Assembly questions about standards in emergency and other temporary accommodation.

To these questions (see, among a great many others, DFC responses to AQW 40818/22-27, AQW 33378/22-27, AQW 36503/22-27) the DFC reply habitually begins

this issue is an operational matter for the Northern Ireland Housing Executive. I have sought the requested information from the Chief Executive, who has advised me as follows...

– as though the DFC were unaware of and not the department responsible for the functioning of the Housing Executive. Then follows the information that the Housing Executive block books hotel rooms like any other entity-- and that the only standard applied to the accommodation’s conditions is that of Tourism NI. This regardless of the fact that families with children are being placed repeatedly and for long duration in a succession of such hotels, without access to cooking or laundry facilities, with concrete effects on their wellbeing. This is another clear example of DFC and Housing Executive policy resoundingly failing at responding to emerging issues causing harm amongst vulnerable homeless families across the north.

Recourse and redress of breaches of the Decent Homes Standard

The 2004 Decent Homes Standard NI [was designed](#) without any effective mechanism for monitoring, not to mention enforcing, its provisions. This has led to 22 years of tenants suffering from breaches of the standard without any effective or accessible way of responding. (According to the DFC [webpage](#) on the Decent Homes Standard, the only ‘monitoring’ designed for it is the [stock condition survey](#) recommended to housing associations. This is self-initiated, self-conducted reporting by the housing association of its own homes – not a guarantee of impartial or timely results.)

More broadly, housing conditions across the north are [tracked](#) through the Housing Executive’s periodic House Condition Survey, which measures a set of randomly-selected

dwellings of all tenures against the Decent Homes Standard. This provides a snapshot of housing conditions but is not in any way a vehicle for responding to concrete examples of breaches of the Decent Homes Standard. (A [preliminary report](#) with a cursory and very general overview of findings from the 2023 NI house condition survey was released in January 2026; thematic reports are meant to follow at some future date.)

What NI lacks is a **Housing Health and Safety Rating System** like that brought in in England and Wales to monitor compliance with their Decent Homes Standard. This consultation fails to address that gap.

Unsurprisingly for the body which appears to have passed up the opportunity provided by the example of the Housing Health and Safety Rating System and the more recent passage of Awaab's Law, the Department has not proposed introducing any compliance mechanisms to its updated Decent Homes Standard. (A 2013 proposal by the academics who conducted initial [research](#) (pp. 69-74) into what eventually became the DFC's Fundamental Review of Allocations – for a **Strategic Independent Allocations Scrutiny Panel** aimed at ensuring that the scheme was “sustainable, fair, equitable, robust, consistent, customer driven, transparent, complaint, efficient and value for money” – disappeared from the proposals taken forward in 2017.) This department appears allergic to accountability mechanisms.

Social housing tenants here have been living with the aftereffects of the failure to design effective mechanisms for monitoring and enforcing compliance with the Decent Homes Standard – they deserve better.